

1 The Honorable Barbara J. Rothstein
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7 **UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

8 MICHAEL CHAVEZ,
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10 Plaintiff,
11 v.
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13 AMAZON WEB SERVICES, INC., a
14 Delaware Corporation,
15

16 Defendant.
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18 No. 2:21-cv-00007 BJR
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20 **PLAINTIFF'S INITIAL
21 DISCLOSURES PURSUANT TO
22 FRCP 26(a)(1)**

23 Pursuant to Federal Rules of Civil Procedure 26(a)(1) and the Court's Order dated
24 January 25, 2021, Plaintiff Michael Chavez ("Plaintiff"), by and through his undersigned
counsel, hereby submits his initial disclosures as follows:

25 **A. Presently Known Individuals Likely to Have Discoverable Information**

26 The following individuals are believed to have information that Plaintiff may use to
27 support his claims, although Plaintiff does not yet know the full extent of each person's
28 knowledge.

29 1. Michael Chavez
30 c/o Mix Sanders Thompson, PLLC
31 1420 Fifth Avenue, Suite 220
32 Seattle, WA 98101
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- 1 2. Samir Kopal
2 c/o Perkins Coie, LLC
3 1201 3rd Avenue, Suite 4900
4 Seattle, WA 98101
5 Mr. Kopal was a Software Development manager and a direct supervisor of Mr.
6 Chavez. Mr. Kopal has information regarding the operation of Amazon, the job
7 duties of Mr. Chavez and other information relevant to the claims and defenses
8 asserted in this matter.
- 9 3. Jennifer Zumeck
10 c/o Perkins Coie, LLC
11 1201 3rd Avenue, Suite 4900
12 Seattle, WA 98101
13 Ms. Zumeck was a Senior HR Business Partner who communicated with both Mr.
14 Chavez and Mr. Kopal regarding Mr. Chavez's request for accommodation. Ms.
15 Zumeck has information regarding the operation of Amazon and other
16 information relevant to the claims and defenses asserted in this matter
- 17 4. Heidi Kucera Taylor
18 c/o Perkins Coie, LLC
19 1201 3rd Avenue, Suite 4900
20 Seattle, WA 98101
21 Ms. Taylor was a Senior Accommodation Consultant at Amazon who
22 communicated with Mr. Chavez regarding Mr. Chavez's request for
23 accommodation. Ms. Zumeck has information regarding the operation of Amazon
24 and other information relevant to the claims and defenses asserted in this matter
- 25 5. Christiana Manegold
26 c/o Perkins Coie, LLC
27 1201 3rd Avenue, Suite 4900
28 Seattle, WA 98101
29 Ms. Manegold was a Senior HR Business Partner at Amazon. Ms. Manegold has
30 information regarding the interactions between Mr. Chavez and Mr. Kopal, the
31 operation of Amazon and other information relevant to the claims and defenses
32 asserted in this matter
- 33 6. Maria Tellez
34 c/o Perkins Coie, LLC
35 1201 3rd Avenue, Suite 4900
36 Seattle, WA 98101
37 Ms. Taylor was a Program Manager at Amazon. Ms. Tellez has information
38 regarding the adequacy of Mr. Chavez's performance, the interactions between
39 Mr. Chavez and Mr. Kopal, the operation of Amazon and other information
40 relevant to the claims and defenses asserted in this matter
- 41 7. Yuri Ellis
42 Address Unknown

1 Ms. Ellis was a Business Operations Manager at Amazon. It is believed that she
 2 is no longer with Amazon at this time. Ms. Ellis has information regarding the
 3 operation of Amazon and other information relevant to the claims and defenses
 asserted in this matter

4 8. Philip Fitzsimons
 5 c/o Perkins Coie, LLC
 6 1201 3rd Avenue, Suite 4900
 7 Seattle, WA 98101

8 Mr. Fitzsimons was a Senior Manager for AWS Well-Architect Team at
 9 Amazon. Mr. Fitzsimons has information regarding the operation of Amazon and
 asserted in this matter.

10 9. As yet identified former and current employees of Amazon who may have
 11 information regarding the operation of Amazon and other information relevant to
 12 the claims and defenses asserted in this matter.

13 10. Dr. Mark Holmes and/or other similarly qualified provider
 14 Regional Epilepsy Center - Harborview
 15 West clinic, 325 9th Ave, 4th Floor
 16 Seattle, WA 98104

17 Dr. Holmes has been Mr. Chavez's treating neurologist and may testify as to his
 18 knowledge of Plaintiff's medical and treatment history before, during and after
 19 his employment at Amazon, and may be asked to provide additional opinions
 asserted in this matter.

20 11. Laila May Chavez
 21 c/o Mix Sanders Thompson, PLLC
 22 1420 Fifth Avenue, Suite 220
 23 Seattle, WA 98101

24 Ms. Chavez is the ex-wife of Plaintiff and may testify from personal knowledge
 as to all observations during the relevant time period.

12. Other associates, friends, and family of Plaintiff may be added to this list.

20 **B. Description of Documents that Plaintiff May Use to Support His Claims**

No.	Document	Bates No.
1.	Electronic communications between Mr. Kopal and Mr. Chavez	CHAVEZ00001-CHAVEZ0064

1 Plaintiff reserves his right to designate additional documents identified by any party,
2 produced by any party in discovery, or disclosed to or provided to experts identified by any
3 party.

4 **C. Claim for Damages**

5 Plaintiff seeks an appropriate award of back pay and front pay, together with all actual
6 and compensatory economic damages, as well as noneconomic damages, a post-verdict award
7 of all awardable expenses of litigation, interest, and reasonable attorneys' fees as allowed by
8 law. To the best of Plaintiff's ability, and pending further investigation, ascertainable damages
9 to date include the following:

10 Back Pay/Front Pay: \$175,000.00
11 Lost Year Two Bonus: \$12,000.00
12 Loss of Restricted Stock Units (RSUs): \$120,686.67
13 General Damages: \$200,000.00+

14 Documents supporting the foregoing are in the possession of Defendant. Plaintiff reserves
15 the right to supplement this response.

16 **D. Insurance Agreement Which May be Liable for Judgment**

17 Not applicable.

18 Dated this 18th day of March, 2021.

MIX SANDERS THOMPSON, PLLC

19 *s/Michael G. Sanders*

20 Michael G. Sanders, WSBA No. 33881

21 Brian (Heyun) Rho, WSBA No. 51209

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Seattle, WA 98101

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24 Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, Kelly Lee, hereby certify that on March 18, 2021 I caused to be served a true and correct copy of the foregoing DEFENDANTS' FRCP 26(a)(1) INITIAL DISCLOSURES via the method indicated below and addressed to the following:

Kevin Hamilton
Margo Jasukaitis
Perkins Coie, LLP
1201 3rd Avenue, Suite 4900
Seattle, WA 98101
Attorney for Defendant
✉ E-mail: KHamilton@perkinscoie.com;
MJasukaitis@perkinscoie.com
✉ CM/ECF Service

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

s/Kelly Lee
Mix Sanders Thompson, PLLC
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